

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:
	:
- v. -	:
	:
	<b><u>PROTECTIVE ORDER</u></b>
	:
LUDWIG CRISS ZELAYA ROMERO,	:
MARIO GUILLERMO MEJIA VARGAS,	:
JUAN MANUEL AVILA MEZA,	:
CARLOS JOSE ZAVALA VELASQUEZ,	:
VICTOR OSWALDO LOPEZ FLORES, and	:
JORGE ALFREDO CRUZ CHAVEZ,	:
	:
Defendants.	:
- - - - -	X

LORNA G. SCHOFIELD, District Judge:

1. WHEREAS, LUDWIG CRISS ZELAYA ROMERO, MARIO GUILLERMO MEJIA VARGAS, JUAN MANUEL AVILA MEZA, CARLOS JOSE ZAVALA VELASQUEZ, VICTOR OSWALDO LOPEZ FLORES, and JORGE ALFREDO CRUZ CHAVEZ (the "Defendants") have certain rights under the United States Constitution, federal statutes, and the Federal Rules of Criminal Procedure, to pre-trial discovery;

2. WHEREAS, the Government recognizes its obligation to provide such discovery materials to the Defendants, consistent with safety considerations and the confidentiality of ongoing investigations;

3. WHEREAS, the discovery materials that the Government intends to provide to the Defendants contain certain materials that, if disseminated to third parties, could, among other things,

implicate the safety of others and impede ongoing investigations;

4. IT IS HEREBY ORDERED that, pursuant to Federal Rule of Criminal Procedure 16(d) and subject to the additional limitations set forth below, the discovery materials provided by the Government to counsel for the Defendants ("Defense Counsel") shall not be further disseminated by the Defendants or Defense Counsel to any individuals, organizations, or other entities, other than members of the Defendants' respective defense teams (limited to: co-counsel, paralegals, investigators, translators, litigation support personnel, secretarial staff, and the pertinent Defendant);

5. IT IS FURTHER ORDERED that the discovery materials may not be provided to any foreign persons or entities (even if such persons or entities are members of a defense team) and may not be transmitted outside of the United States for any purpose;

6. IT IS FURTHER ORDERED that each of the individuals to whom disclosure of the discovery materials is made shall be provided a copy of this Protective Order by Defense Counsel and will be advised by Defense Counsel that he or she shall not further disseminate or discuss the materials and must follow the terms of this Protective Order;

7. IT IS FURTHER ORDERED that Defense Counsel may seek authorization of the Court, with notice to the Government, to show (but not provide copies of) certain specified discovery materials to persons whose access to discovery materials is otherwise

prohibited by the preceding paragraphs, if it is determined by the Court that such access is necessary for the purpose of preparing the defense of the case;

8. IT IS FURTHER ORDERED that all discovery materials are to be provided to the Defendants, and used by Defense Counsel and their respective defense teams, solely for the purpose of allowing the Defendants to prepare their defenses to the charges in Superseding Indictment S1 15 Cr. 174 (LGS), and that none of the discovery materials produced by the Government to the Defendants shall be disseminated to any other third party in a manner that is inconsistent with the preceding paragraphs;

9. IT IS FURTHER ORDERED that, at the conclusion of this case, Defense Counsel shall return to the Government all copies of the discovery materials provided in this case;

10. IT IS FURTHER ORDERED that nothing in this Protective Order prohibits the media from requesting copies of any items that are received by the Court as public exhibits at a hearing, trial, or other proceeding; and

11. IT IS FURTHER ORDERED that nothing in this Protective Order shall preclude the Government from seeking a further protective order pursuant to Rule 16(d) as to particular items of discovery material.

Dated: \_\_\_\_\_, 2016  
New York, New York

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HONORABLE LORNA G. SCHOFIELD  
United States District Judge  
Southern District of New York